

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATE OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 12 CR 842
)	
STEVEN MANDELL)	Judge Amy St. Eve
)	
Defendant.)	
)	

**MOTION OF STEVEN MANDELL TO REVEAL IDENTITY OF INFORMANTS
AND CONTENTS OF DEALS**

Comes now Steven Mandell, by and through his attorneys Keith Spielfogel and Robert Loeb, and respectfully moves this Honorable Court to order the government to produce the following information:

1. The names and addresses of any government informant involved in this case.
2. Any representations, promises, or other consideration offered by the government, its cooperating agencies, or its agents to any informants concerning the informants' alleged violations of federal and/or state laws.
3. Any representation, promises, or other consideration offered by the government, its cooperating agencies, or its agents to any informants concerning the informants' sentencing in any other pending criminal case or in any potential criminal matter that concerns the informant.
4. A list of any and all potential criminal charges that were not brought by the

government, its cooperating agencies, or its agents in exchange for the information provided in the present case.

5. A list of any and all potential criminal charges that were not brought by the government, its cooperating agencies, or its agents in exchange for information provided in any other criminal matter or investigation involving persons not included in the Superseding Indictment.

6. The precise nature of any monetary consideration offered or promised to any informants including, but not limited to, a listing of funds the government, its agents, or cooperating agencies paid to or on behalf of any informant.

8. The precise nature of any implied or explicit assistance with housing given directly or indirectly to the informant, the informant's family members, or the informant's friends by the government, its cooperating agencies, or its agents.

9. Any record maintained by the government, its cooperating agencies, or its agents showing any informant's arrest and conviction record.

10. Any documentation including, but not limited to notes, record, report, or other documents maintained by the government, its cooperating agencies, or its agents documenting conversations between the government, its cooperating agencies, or its agents and potential informants. This includes both typewritten and handwritten documents. See also Motion For Production Of Agents Notes.

11. Any documentation including, but not limited to letters, facsimiles, or other communications between the government, its cooperating agencies, or its agents and the counsel of informants. This includes both typewritten and handwritten documents.

12. The dates, times, and places of any previous undercover operations by

the government, its cooperating agencies, or its agents and the informants involved in the present case, including the consideration the informant received for his/her participation in those operations.

13. Any and all other explicit or implied, direct or indirect, promises, payments, inducements or considerations offered to any informant in exchange for his or her cooperation, assistance, information, or testimony.

WHEREFORE, defendant Steven Mandell moves that the government be ordered to reveal the above requested information regarding informants.

Respectfully submitted,
s/Keith Spielfogel
Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of August 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all parties pursuant to the district court's system as to ECF filers.

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